

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

**CSX TRANSPORTATION, INC.,
individually and on behalf of
NORFOLK AND PORTSMOUTH BELT LINE
RAILROAD COMPANY,**

Plaintiff,

v.

Civil Action No. 2:18-cv-530-MSD-LRL

NORFOLK SOUTHERN RAILWAY COMPANY, *et al.*,

Defendants.

MOTION TO SEAL

Defendant Norfolk and Portsmouth Belt Line Railroad Company, by counsel, pursuant to Local Civil Rule 5 and the Stipulated Protective Order entered on October 29, 2019 (D.E. 79), moves this Court for entry of an Order substantially in the form as **Exhibit 1** hereto permitting the Belt Line to file under seal Exhibits A, B, D, G, and H to the memorandum in support of its motion to compel (being filed concurrently herewith), as well as references to those exhibits in the body of that memorandum in support.

- Exhibit A – Plaintiff’s objections and responses to the Belt Line’s first interrogatories and requests for admission;
- Exhibit B – Correspondence from plaintiff’s counsel dated July 13, 2020 containing references to and descriptions of documents marked by Plaintiff as confidential;
- Exhibit D – Collection of documents marked by Plaintiff as confidential and/or attorneys’ eyes only;
- Exhibit G – Plaintiff’s second supplemental answers to the Belt Line’s first interrogatories; and
- Exhibit H – Collection of supplemental documents marked by Plaintiff as confidential and/or attorneys’ eyes only.

Grounds for this Motion are set forth in the accompanying Memorandum in Support. Accordingly, the Belt Line requests that this Court grant it leave to file the memorandum in support of the motion to compel and the above exhibits under seal, with such version to remain sealed until further order of the Court.

Dated: July 24, 2020

**NORFOLK AND PORTSMOUTH
BELT LINE RAILROAD COMPANY**

By: /s/ W. Ryan Snow

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CERTIFICATE OF SERVICE

I certify that on this 24th day of July 2020, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a "Notice of Electronic Filing" to all counsel of record who have consented to electronic service.

By: /s/ W. Ryan Snow

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